

BROMBERG LAW OFFICE, P.C.

Brian L. Bromberg (Admitted in NY, NJ & CA)


December 3, 2021

Via ECF

Honorable Philip M. Halpern, U.S.
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Application granted. The time to move to reopen this case is extended to January 5, 2022. The Clerk of Court is respectfully requested to terminate the letter-motion (Doc. 130).

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
December 6, 2021

Re: *Stephenson v Exclusive Motor-Sports, LLC, et al.*
SDNY Case No. 20-CV-01332 (PMH)

Dear Judge Halpern:

My office, together with co-counsel, represents the plaintiff, Dana Stephenson, in the above-referenced case.

I am writing to request a 30-day extension of the December 5, 2021 deadline to restore the case, so we can wrap up the settlement with the “Exclusive Defendants.” I am making this request because we are still working on the settlement documents and Plaintiff has not yet received the settlement funds. My last communication from defense counsel, Alison Drew, Esq., was 11 days ago and we are waiting to hear back from her about some disagreements as to the settlement language. (I believe the delay may be because of the fact that the owners of the Exclusive Defendants are still in prison.)

I reached out to Ms. Drew by email and I left her a voicemail today about the December 5th deadline and about the fact that I would have to make this letter-motion, but I have not heard back from her.

Respectfully,

/s/ Brian L. Bromberg

Brian L. Bromberg

cc: Alison Drew, Esq. (Via Email: alison.drew@parlatorelawgroup.com)
All Counsel of Record (Via ECF)